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10 Counsel For Official Committee of Unsecured Creditors

11
12 **UNITED STATES BANKRUPTCY COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **SANTA ANA DIVISION**

15 In re:

16 THE LITIGATION PRACTICE GROUP,
17 P.C.,

18 Debtor.

Chapter 11

Case No. 8:23-bk-10571-SC

**STIPULATION TO EXTEND DEADLINE
FOR OFFICIAL COMMITTEE OF
UNSECURED CREDITORS TO FILE A
RESPONSE TO THE CHAPTER 11
TRUSTEE'S MOTION FOR ORDER
APPROVING COMPROMISE OF
CONTROVERSY AS TO DEFENDANT
MAVERICK BANKCARD, INC.**

Date: March 13, 2024

Time: 11:00 a.m.

Judge: Hon. Scott C. Clarkson
411 West Fourth Street
Santa Ana, CA 92701

FOX ROTHSCHILD LLP
10250 Constellation Boulevard, Suite 900
Los Angeles, California 90067
(310) 598-4150
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The Official Committee of Unsecured Creditors (the “Committee”) of The Litigation Practice Group P.C., Richard A. Marshack, in his capacity as the chapter 11 trustee of The Litigation Practice Group P.C. (the “Trustee” and, together with the Committee, the “Parties”), stipulate and agree as follows (the “Stipulation”).

RECITALS

A. On March 20, 2023 (the “Petition Date”), The Litigation Practice Group P.C. (the “Debtor”), filed a voluntary petition under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Central District of California (the “Court”), commencing the above-captioned bankruptcy case (the “Bankruptcy Case”).

B. On May 8, 2023, the Court entered an order [Docket No. 65] approving the appointment of the Trustee.

C. On June 23, 2023, the Office of the United States Trustee appointed [Docket No. 134] the Committee, which was amended [Docket No. 157] to increase the number of Committee members on June 29, 2023.

D. On February 16, 2024, the Trustee filed a *Motion for Order Approving Compromise of Controversy Pursuant to Federal Rule of Bankruptcy Procedure 2019 as to Defendant Maverick Bankcard, Inc.* [Docket No. 942] (“Motion”).

E. As of the date of this Stipulation, the current deadline to file and serve a written opposition to the Motion is February 28, 2024 (the “Objection Deadline”).

F. The Parties have agreed that it is in the best interests of the estate to agree to an extension of the Objection Deadline.

STIPULATION

NOW, THEREFORE, based on the foregoing, the Parties agree and stipulate as follows:

1. The Parties restate and incorporate the foregoing Recitals set forth above.
2. The Objection Deadline for the Committee to file a written objection to the Motion shall be extended from February 28, 2024, through and including March 7, 2024.
3. The deadline for the Trustee to file a reply to any objection filed by the Committee is

1 extended from March 6, 2024, through and including March 12, 2024.

2 4. Notwithstanding anything to the contrary contained herein, this Stipulation is without
3 prejudice to further requests for an extension of the deadlines set forth in this Stipulation.

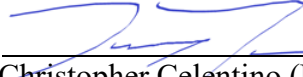
4 DATED this 28th day of February 2024.

5
6 **FOX ROTHSCHILD LLP**

7 By: /s/ Nicholas A. Koffroth

8 Keith C. Owens (Bar No. 184841)
9 Nicholas A. Koffroth (Bar No. 287854)
10 Constellation Place
11 10250 Constellation Blvd., Suite 900
12 Los Angeles, California 90067
13 *Counsel for the Committee*

6 **DINSMORE & SHOHL LLP**

7 By: 
8 Christopher Celentino (Bar No. 131688)
9 Christopher B. Ghio (Bar No. 259094)
10 Jeremy B. Freedman (Bar No. 308752)
11 655 West Broadway, Suite 800
12 San Diego, California 92101
13 *Special Counsel for Trustee*

FOX ROTHSCHILD LLP
10250 Constellation Boulevard, Suite 900
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(310) 598-4150
(310) 556-9828 (fax)

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 10250 Constellation Boulevard, Suite 900, Los Angeles, CA 90067.

A true and correct copy of the foregoing documents entitled: STIPULATION TO EXTEND DEADLINE FOR OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO FILE A RESPONSE TO THE CHAPTER 11 TRUSTEE'S MOTION FOR ORDER APPROVING COMPROMISE OF CONTROVERSY AS TO DEFENDANT MAVERICK BANKCARD, INC. on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 2/28/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Eric Bensamochan** eric@eblawfirm.us, G63723@notify.cincompass.com
- **Ronald K Brown** ron@rkbrownlaw.com
- **Christopher Celentino** christopher.celentino@dinsmore.com, caron.burke@dinsmore.com
- **Shawn M Christianson** cmcintire@buchalter.com, schristianson@buchalter.com
- **Randall Baldwin Clark** rbc@randallbclark.com
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- Johnny White JWhite@wrsllawyers.com, jlee@wrsllawyers.com;eweiman@wrsllawyers.com

2. **SERVED BY UNITED STATES MAIL:** On 2/28/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows.

Debtor

The Litigation Practice Group P.C.
17542 17th St., Suite 100
Tustin, CA 92780

See attached for additional parties

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 2/28/2024, I served the following persons and/or entities by personal delivery, mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Scott C. Clarkson
United States Bankruptcy Court, Central District of California
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

2/28/2024

Kimberly Hoang

/s/ Kimberly Hoang

Date

Printed Name

Signature

Additional Parties Served by U.S. Mail

Creditors who have the 20 largest unsecured claims

Debt Validation Fund II, LLC
5075 Lower Valley Road,
Atglen, PA 19310

MC DVI Fund 1, LLC; MC
DVI Fund 2, LLC
598 Cottonwood Dr.,
Glenview, IL 60026

Validation Partners LLC
1300 Sawgrass Pkwy, Ste. 110
Sunrise, FL 33323

Marich Bein LLC
99 Wall Street, Ste 2669
New York, NY 10005

Business Centers of America
1100 Sir Francis Drake Blvd,
Ste 1, Kentfield, CA 94904

JP Morgan Chase
3 Park Plaza, Ste 900
Irvine, CA 92614

CA Franchise Tax Board
PO Box 942857
Sacramento, CA 94257-0511

Outsource Accelerator Ltd
City Marque Limited
Unit 8801-2 Bldg. 244-248
Des Voeux Rd.
Central Hong Kong

Collaboration Advisors
400 Dorla Court
Zephyr Cove, NV 89448

Anthem Blue Cross
PO Box 511300
Los Angeles, CA 90051-7855

Azevedo Solutions Groups, Inc.
420 Adobe Canyon Rd.
Kenwood, CA 95452

Debt Pay Pro
1900 E Golf Road, Suite 550
Schaumburg, IL 60173

1
2 Sharp Business Systems
8670 Argent St
3 Santee, CA 92071
4 Tustin Executive Center
1630 S Sunkist Steet, Ste A
5 Anaheim, CA 92806

6 Exela Enterprise Solutions
2701 E. Grauwyler Road
7 Irving, TX 75061

8 Netsuite-Oracle
2300 Oracle Way
9 Austin, TX 78741

10 Credit Reporting Service Inc
548 Market St, Suite 72907
11 San Francisco, CA 94104-5401

12 Document Fulfillment Services
2930 Ramona Ave #100
13 Sacramento, CA 95826

14 Executive Center LLC
5960 South Jones Blvd
15 Las Vegas, NV 89118

16 LexisNexus
15500 B Rockfield Blvd
17 Irvine, CA 92618

18
19 **Secured Creditors**

20 Diverse Capital LLC
323 Sunny Isles Blvd., Suite 503
21 Sunny Isles, FL 33154

22 City Capital NY
1135 Kane Concourse
23 Bay Harbour Islands, FL 33154

24 Counsel for secured creditor Fundura Capital Group
Mitchell B. Ludwig
Knapp, Petersen & Clarke
25 550 North Brand Blvd., Suite 1500
Glendale, CA 91203
26
27
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